



U.S. Department of Justice

United States Attorney  
Southern District of New York

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86 Chambers Street  
New York, New York 10007

January 16, 2015

**BY ECF and HAND**

Hon. Paul G. Gardephe  
United States District Judge  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *United States et al. ex rel. Bilotta v. Novartis*, No. 11 Civ. 0071 (PGG)

Dear Judge Gardephe:

We represent the United States in the above-referenced *qui tam* action, and write respectfully on behalf of all parties to request that the Court enter the Protective Order attached hereto as Exhibit A. Pursuant to the Court's Individual Rules of Practice, we have also attached hereto as Exhibit B a blackline showing all deviations between the parties' proposed Protective Order and the Court's Model Protective Order.

Respectfully submitted,

PREET BHARARA  
United States Attorney

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